

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

MELVIN NEWSOME, et al.

Plaintiffs,

v.

UP-TO-DATE LAUNDRY, INC., et al.

Defendants.

Civil Action No. S01-2257 (WDQ)

JOINT MOTION TO SEAL CONSENT DECREE SUPPLEMENT

The parties in the above-styled case hereby jointly move the Court to place under seal a supplement to the proposed Consent Decree (electronically filed by the parties on June 10, 2004). The parties electronically filed their proposed Consent Decree without attaching the sealed supplement.

Pursuant to Federal Rule of Civil Procedure Rule 23, the class action certified in this case allows for opt outs. The sealed supplement contains sensitive information about the opt out procedures the parties have agreed to in this case. If the information was made public, it could influence the implementation of the Consent Decree. Thus, the supplement should remain sealed in order to avoid any attempts to undermine the proposed Consent Decree. There are no alternatives to sealing that would provide sufficient protection for the information contained in the supplement to the proposed Consent Decree.

With the original of this motion, the parties will file on June 10, 2004 an envelope with the Consent Decree supplement enclosed an envelope marked "SEALED PURSUANT TO ORDER OF COURT DATED _____."

Respectfully submitted,

/s/

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